

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
Western Division**

**J.&J SPORTS PRODUCTIONS, INC.,**  
**Plaintiff,**  
**v.**  
**HILDA ARGUETA, DANIEL ARGUETA and**  
**JOHN ARGUETA, indiv. and d/b/a**  
**CHARLIE'S RESTAURANT AND BAR INC.**  
**d/b/a CHARLIE'S RESTAURANT AND BAR**  
**and CHARLIE'S RESTAURANT AND BAR**  
**INC. d/b/a CHARLIES' RESTAURANT AND**  
**BAR,**  
**Defendants.**

**Case No. 2012-cv-50226**

**PLAINTIFF'S MOTION TO REINSTATE AND ENTER AN ORDER OF  
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., and respectfully requests that this Court Reinstate this matter against Defendants, HILDA ARGUETA, DANIEL ARGUETA and JOHN ARGUETA, indiv. and d/b/a CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR and CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR, and in support thereof, states as follows:

1. That on March 27, 2013, this matter was dismissed without prejudice by this Honorable Court.
2. That a Settlement Agreement was entered into by both parties wherein which the Defendants would pay a total of \$5,000.00 to the Plaintiff. Payments in the amount of \$200.00 were to be made on or before the 15<sup>th</sup> of each month beginning on February 15, 2013 and continuing through January 15, 2014. See attached Exhibit A.
3. As of the filing of this motion, Defendant has paid Plaintiff a total of \$400.00 towards the \$5,000.00 settlement which was made in May of 2013.
4. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$4,600.00 plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00).

See attached Affidavit Exhibit B.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

**WHEREFORE**, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an order to Reinstate this case against Defendants, HILDA ARGUETA, DANIEL ARGUETA and JOHN ARGUETA, indv. and d/b/a CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR and CHARLIE'S RESTAURANT AND BAR INC. d/b/a CHARLIE'S RESTAURANT AND BAR, and enter an Order for Judgment in the amount of Four Thousand Six Hundred and 00/100 (\$4,600.00) plus attorney's fees in the amount of Six Hundred and 00/100 (\$600.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Eight Thousand Two Hundred and 00/100 (\$8,200.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu

Andre Ordeanu

#### **CERTIFICATE OF SERVICE**

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on January 22, 2014, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu

Andre Ordeanu

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